

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

REMARKS

Applicant has carefully studied the Office Action. This paper is intended to be fully responsive to all points of rejection and objection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application are respectfully requested.

Status of the Claims

Claims 1-40 are pending in the Application. Claims 1, 16, 29, 30, 33 and 34 have been amended.

Finality of Action

Since the outstanding Office Action was made Final, Applicant is filing concurrently herewith a Request for Continued Examination under 37 CFR 1.114, including the required fee. Applicant respectfully requests that the Examiner reconsiders the pending claims in view of the foregoing amendment and the following remarks.

Telephone Interview Summary

Applicant would like to thank the Examiner for the courtesy of an informal telephone interview with the Applicant in March 2005.

During the telephone interview, the Applicant and the Examiner discussed the pending claims and other parts of the application. Although an agreement was not reached, the Applicant indicated that Applicant intends to file a response to the Office Action.

Specification

In page 13 of the Office Action, the Examiner stated that claims 35-40 rely upon provisional patent applications incorporated by reference for essential subject matter, and requested that the essential subject matter be added to the disclosure of the application through an appropriate correction, in view of M.P.E.P. §608.01(p) and §2163.07(b).

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Accordingly, Applicant has amended the specification by adding, in paraphrase, the text of claims 35-40, based on the Examiner's statement that claims 35-40 rely upon provisional patent applications incorporated by reference.

No new matter has been added.

Amendment of Claims

Applicant has amended claims 1, 16, 29, 30, 33 and 34 to clarify what the Applicant regards as the invention.

No new matter has been added by this Amendment.

Specifically, claims 1, 16, 30, 33 and 34 have been amended to clarify, in paraphrase, that the model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and that the model diagram includes symbols representing stateful objects (e.g., objects having one of multiple optional states) associated with states and processes, structural links, procedural links, and control links.

Claims 1 and 33 have been further amended to clarify that upon modification of the diagrammed model, the textual description is modified substantially in real time to reflect the modification of the diagrammed model.

Claims 16 and 34 have been further amended to clarify that upon modification of the textual description, the diagrammed model is modified substantially in real time to reflect the modification of the textual description.

Claim 29 has been amended to clarify that the method provides an animated simulation of a modeled system, wherein dynamics of said modeled system are shown by at least animated flow of control, process execution, object creation, object destruction, and object state modification.

Claim 30 has been further amended to clarify that upon modification of the input diagram, the text in the second natural language is modified substantially in real time to reflect the modification of the input diagram.

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Applicant respectfully submits that in view of the foregoing amendments, the rejections of claims 1-40 are now moot.

Claim Interpretations

The Examiner has made certain claim interpretations with regard to certain elements recited in claims 3-5, 13, 18-21, 25, and 30-32.

Without specifically relating to any of the interpretations made by the Examiner, Applicant reserves all rights in other possible interpretations of the claims.

Claim Rejections Under 35 USC §102(b)

The Examiner rejected claims 1-11, 14 and 33 under 35 USC §102(b) as being anticipated by United States Patent Number 5,187,788 to Marmelstein ("Marmelstein").

Marmelstein describes an automatic code generation tool for the Ada programming language, allowing a programmer to create a graphical representation of an initial program design akin to a flowchart, and producing Ada code based on the graphical representation.

As is well established, in order for a claim to be anticipated by the prior art, each and every element and feature of the claim must be included in a single prior art document.

Amended independent claim 1 recites, *inter alia*, "said model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and wherein said model diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links" and "upon modification of said diagrammed model, modifying said textual description substantially in real time to reflect the modification of the diagrammed model". Marmelstein does not disclose, teach or suggest at least these features of claim 1.

Amended independent claim 33 recites, *inter alia*, "said model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and wherein said model diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links" and "upon modification of said diagrammed model, modify said textual

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description substantially in real time to reflect the modification of the diagrammed model". Marmelstein does not disclose, teach or suggest at least these features of claim 33.

In view of the above, Marmelstein does not anticipate either of independent claims 1 and 33, as amended.

Claims 2-11 and 14 are dependent from amended independent claim 1, and include all the features of amended independent claim 1 as well as additional distinguishing features. Therefore, it is respectfully submitted that the novelty of claims 2-11 and 14 follows directly from the novelty of amended independent claim 1 and therefore, none of claims 2-11 and 14 is anticipated by Marmelstein.

In view of the above, Applicant respectfully requests that the rejection of claims 1-11, 14 and 33 under 35 USC §102(b) as being anticipated by Marmelstein be withdrawn.

The Examiner rejected claims 16-29 and 34 under 35 USC §102(b) as being anticipated by United States Patent Number 4,315,315 to Kossiakoff ("Kossiakoff").

Kossiakoff describes a process for automatically producing a computer program in machine assembly language directly from a two-dimensional network representing the flow of data and control logic.

As is well established, in order for a claim to be anticipated by the prior art, each and every element and feature of the claim must be included in a single prior art document.

Amended independent claim 16 recites, *inter alia*, "said model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and wherein said model diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links" and "upon modification of said textual description, modifying said diagrammed model substantially in real time to reflect the modification of the textual description". Kossiakoff does not disclose, teach or suggest at least these features of claim 16.

Amended independent claim 34 recites, *inter alia*, "said model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral

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aspects of a system, and wherein said model diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links” and “upon modification of said textual description, modify said diagrammed model substantially in real time to reflect the modification of the textual description”. Kossiakoff does not disclose, teach or suggest at least this feature of claim 34.

In view of the above, Kossiakoff does not anticipate either of independent claims 16 and 34, as amended.

Claims 17-29 are dependent from amended independent claim 16, and include all the features of amended independent claim 16 as well as additional distinguishing features. Therefore, it is respectfully submitted that the novelty of claims 17-29 follows directly from the novelty of amended independent claim 16 and therefore, none of claims 17-29 is anticipated by Kossiakoff.

In view of the above, Applicant respectfully requests that the rejection of claims 16-29 and 34 under 35 USC §102(b) as being anticipated by Kossiakoff be withdrawn.

Furthermore, Applicant respectfully submits that the above-mentioned distinctions of claims 1-11, 14, 16-29, 33, and 34, as amended, are significant and would not have been obvious at the time the invention was made to a person having ordinary skill in the art in view of any of the cited references on record, including Marmelstein, Kossiakoff, United States Patent Number 5,321,607 to Fukumochi (“Fukumochi”), United States Patent Number 6,681,383 to Pastor (“Pastor”), United States Patent Number 6,343,265 to Glebov (“Glebov”), and any combinations of these references. Therefore, Applicant respectfully submits that claims 1-11, 14, 16-29, 33, and 34, as amended, meet the patentability requirements of 35 USC §103.

Claim Rejections Under 35 USC §103(a)

The Examiner rejected claims 12 and 13 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Fukumochi.

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Fukumochi describes a machine for automatic translation between two natural languages.

According to M.P.E.P. §2142, In order to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure.

Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Fukumochi does not meet the requirements of an obviousness rejection as applied to claims 12 and 13, in that the combination at least fails to teach or suggest all the elements of these claims.

Claims 12 and 13 depend from amended independent claim 1, which recites, *inter alia*, "said model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and wherein said model diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links" and "upon modification of said diagrammed model, modifying said textual description substantially in real time to reflect the modification of the diagrammed model". Marmelstein and/or Fukumochi, alone or in combination, do not disclose, teach or suggest at least these features of the claimed invention, and therefore do not render claims 12-13 obvious.

In view of the above, Applicant respectfully requests that the rejection of claims 12 and 13 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Fukumochi be withdrawn.

The Examiner rejected claim 15 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Kossiakoff.

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Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Kossiakoff does not meet the requirements of an obviousness rejection as applied to claim 15, in that the combination at least fails to teach or suggest all the elements of this claim.

Claim 15 depends from amended independent claim 1, which recites, *inter alia*, “said model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and wherein said model diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links” and “upon modification of said diagrammed model, modifying said textual description substantially in real time to reflect the modification of the diagrammed model”. Marmelstein and/or Kossiakoff, alone or in combination, do not disclose, teach or suggest at least these features of the claimed invention, and therefore do not render claim 15 obvious.

In view of the above, Applicant respectfully requests that the rejection of claim 15 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Kossiakoff be withdrawn.

The Examiner rejected claim 25 under 35 USC §103(a) as being unpatentable over Kossiakoff in view of Marmelstein.

Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Kossiakoff does not meet the requirements of an obviousness rejection as applied to claim 25, in that the combination at least fails to teach or suggest all the elements of this claim.

Claim 25 depends from amended independent claim 16, which recites, *inter alia*, “said model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and wherein said model diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links” and “upon modification of said textual description, modifying said diagrammed model substantially in real time to reflect the

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modification of the textual description". Marmelstein and/or Kossiakoff, alone or in combination, do not disclose, teach or suggest at least these features of the claimed invention, and therefore do not render claim 25 obvious.

In view of the above, Applicant respectfully requests that the rejection of claim 25 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Kossiakoff be withdrawn.

The Examiner rejected claims 30-32 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Fukumochi.

Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Fukumochi does not meet the requirements of an obviousness rejection as applied to claims 30-32, in that the combination at least fails to teach or suggest all the elements of these claims.

Amended independent claim 30 recites, *inter alia*, "said diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and wherein said diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links" and "upon modification of said input diagram, modifying said text in the second natural language substantially in real time to reflect the modification of said input diagram". Marmelstein and/or Fukumochi, alone or in combination, do not disclose, teach or suggest at least these features of the claimed invention. Therefore, the combination of Marmelstein and Fukumochi does not render claim 30 obvious.

Claims 31-32 are dependent from amended independent claim 30, and include all the features of amended independent claim 30 as well as additional distinguishing features. Therefore, it is respectfully submitted that the patentability of claims 31-32 follow directly from the patentability of amended independent claim 30.

In view of the above, Applicant respectfully requests that the rejection of claims 30-32 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Fukumochi be withdrawn.

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The Examiner rejected claim 35 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Pastor.

Pastor describes a software production tool to capture system requirements, convert them into a formal specification, and validate them for correctness and completeness.

Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Pastor does not meet the requirements of an obviousness rejection as applied to claim 35, in that the combination at least fails to teach or suggest all the elements of this claim.

Claim 35 depends from amended independent claim 1, which recites, *inter alia*, “said model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and wherein said model diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links” and “upon modification of said diagrammed model, modifying said textual description substantially in real time to reflect the modification of the diagrammed model”. Marmelstein and/or Pastor, alone or in combination, do not disclose, teach or suggest at least these features of the claimed invention. Therefore, the combination of Marmelstein and Pastor does not render claim 35 obvious.

In view of the above, Applicant respectfully requests that the rejection of claim 35 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Pastor be withdrawn.

The Examiner rejected claims 36-40 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Glebov.

Glebov describes a method for mapping objects defined in a computer design model to a common repository in computer storage.

Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Glebov does not meet the requirements

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of an obviousness rejection as applied to claims 36-40, in that the combination at least fails to teach or suggest all the elements of this claim.

Claims 36-40 depend from amended independent claim 1, which recites, *inter alia*, "said model diagram represents one or more functional aspects, one or more structural aspects, and one or more behavioral aspects of a system, and wherein said model diagram includes symbols representing stateful objects associated with states and processes, structural links, procedural links, and control links" and "upon modification of said diagrammed model, modifying said textual description substantially in real time to reflect the modification of the diagrammed model". Marmelstein and/or Glebov, alone or in combination, do not disclose, teach or suggest at least these features of the claimed invention. Therefore, the combination of Marmelstein and Glebov does not render claims 36-40 obvious.

In view of the above, Applicant respectfully requests that the rejection of claims 36-40 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Glebov be withdrawn.

Conclusion

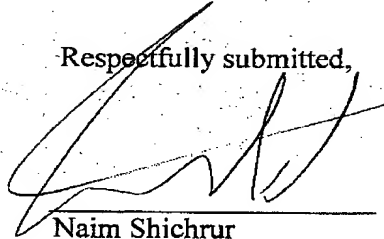
In view of the foregoing amendment and remarks, and for at least the reasons discussed above, Applicant respectfully submits that claims 1-40 are deemed to be allowable. Their favorable reconsideration and allowance are respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this paper, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

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No fees are believed to be due. However, if any fees are due, please charge any such fees to deposit account No. 50-3355.

Respectfully submitted,



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